



Anderson & Shah, LLC
Attorneys at Law

Benjamin H. Zieman, Esq.
856-393-2345
bzieman@andersonshahlaw.com
Fax: 856-528-1700

September 7, 2021

VIA CM/ECF ONLY

Honorable Joseph H. Rodriguez, U.S.D.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Courtroom 5D
Camden, NJ 08101

RE: Doe v. Small, et al.
Docket No. 1:21-cv-11189-JHR-AMD

Dear Judge Rodriguez,

We represent Defendants, the Atlantic City Board of Education, former Superintendent Paul A. Spaventa, and current Superintendent Barry Caldwell, in the above-referenced matter. On September 10, 2021, we intend to move to dismiss most of the claims in the amended complaint pursuant to Fed. R. Civ. P. 12(b)(6). Given both the number and the complexity of the legal issues presented in this case, however, we respectfully request permission to file a brief that is eleven (11) pages longer than permitted under Local Civil Rule 7.2(b). Counsel for Plaintiff has consented to this request, and we would reciprocate should he require additional pages for his opposition.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me directly at 856-393-2371.

Respectfully submitted,

ANDERSON & SHAH LLC

By: s/ Benjamin H. Zieman
Benjamin H. Zieman, Esq.

cc: Terrell A. Ratliff, Esq. (via CM/ECF)
Jeffrey L. Shanaberger, Esq. (via CM/ECF)

Anderson & Shah, LLC

457 Haddonfield Road, Suite 120, Cherry Hill, NJ 08002 | P: (856) 393-2345 | F: (856) 528-1700 | andersonshahlaw.com